

**UNITED STATES OF AMERICA  
BEFORE THE NATIONAL LABOR RELATIONS BOARD  
REGION 28**

AMAZON.COM SERVICES LLC,

Employer,

and

AMAZON LABOR UNION,

Petitioner.

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Case No. 29-RC-288020

**AMAZON.COM SERVICES LLC’S MOTION TO EXCEED PAGE LIMITS WITH  
RESPECT TO ITS BRIEF IN SUPPORT OF EXCEPTIONS**

Pursuant to Sections 102.2(c) and 102.69(f)-(g) of the National Labor Relations Board’s Rules & Regulations, 29 C.F.R. §102.2(c); 102.69(f)-(g), Amazon.com Services LLC (“Amazon”), respectfully moves to exceed the page limit for the supporting brief it intends to file in support of its exceptions to the Hearing Officer’s Report in the above captioned matter, for good cause. In support of this request, Amazon states the following:

1. The hearing in the above-captioned matter took place over 24 business days. Throughout the hearing, the Hearing Officer made repeated and pervasive errors of law and Board procedure that prevented Amazon from presenting a variety of relevant evidence in support of the objections the Regional Director set for hearing. Among other errors, she impermissibly narrowed the scope of the hearing without being directed to do so by the Regional Director; completely prevented Amazon from presenting evidence on several of its numbered objections; misapplied the Board’s Rules & Regulations and interpretative case precedents regarding the relevance and admissibility of evidence sufficiently related to Amazon’s enumerated objections; misapplied Board procedure regarding the proper use of offers of proof, and made uncountable other evidentiary errors, all of which significantly restricted the creation of the evidentiary record.

2. The Hearing Officer's Report on Objections, issued yesterday, is 144 pages in length. It reflects a litany of additional errors arising from her review and recommendations regarding the abbreviated evidentiary record that she did allow. The Hearing Officer applied the wrong legal standards to a variety of Amazon's objections, made unsupported and biased credibility determinations, and failed to consider or even address relevant record evidence supporting numerous of Amazon's objections.

3. Section 102.69 of the Rules & Regulations provides that briefs in support of exceptions shall not exceed 50 pages in length, exclusive of subject index and table of cases and other authorities cited, *see* 29 C.F.R. §102.69(f).

4. The transcript of the hearing in this matter is 5,143 pages in length. Amazon's post-hearing brief to the Hearing Officer was 233 pages in length, and the ALU's post-hearing brief to the Hearing Officer was 138 pages in length. Given the sheer size of the evidentiary record and length of this proceeding, length of the Hearing Officer's Report on Objections, and volume of errors she made both during the hearing and in her Report, it is infeasible for Amazon to adequately address all of its exceptions within the 50-page limit provided for in the Rules.

5. Amazon respectfully requests an augmentation of the page limit governing its supporting brief by an additional 50 pages, allowing its brief in support of its exceptions to be 100 pages in length, exclusive of subject index and table of cases and other authorities cited.

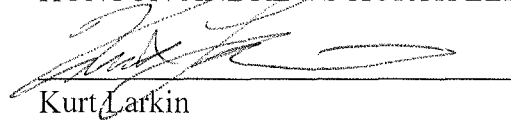
6. Amazon has notified counsel for Petitioner regarding its intent to file the instant motion. Counsel for Petitioner opposes the filing of this motion and the relief requested herein.

7. In light of the foregoing, Amazon respectfully requests that the Regional Director postpone the deadline for filing and serving Amazon's exceptions and supporting brief to Friday, September 30, 2022, and extend the page limit for Amazon's supporting brief to 100 pages.

8. Amazon is filing a concurrent request for Extension of Time seeking an additional ten business days to file its brief and supporting exceptions, using the Board's electronic filing system.

Respectfully submitted,

HUNTON ANDREWS KURTH LLP

A handwritten signature in black ink, appearing to read 'Kurt Larkin', is written over a horizontal line.

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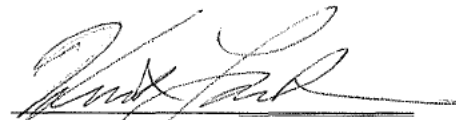
### CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing document was electronically filed with the NLRB and was served by electronic mail this 2<sup>nd</sup> day of September, 2022 to:

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